## 1. INTRODUCTION

Människans Resurser AB (continued as MR AB) has built up its business on people insights and their driving forces. Within our operations, MR AB processes a range of personal data that you have provided to us or that we have obtained from someone else (such as third parties). Your personal data is processed for example in connection with product sales and provision of services such as health tests / body treatments. Because we protect your personal privacy and take privacy issues seriously, we want to describe how MR AB processes your personal information through this privacy policy ("Policy").

Therefore, in the policy we will describe what categories of personal data MR AB is handling, the purposes for which we treat them and the legal basis for which the treatment is based. We also describe who can access and process the data, the principles of thinning, where the personal data are processed and your rights as registered in the form of information, rectification and deletion, etc. We ask you to read the Policy carefully and familiarize yourself with the content as it applies to all processing of personal data within MR AB.

MR AB processes your personal data as a personally responsible person and therefore has an obligation to ensure that the processing is conducted in accordance with this Policy and any applicable personal data legislation. You as a registered person always have the right to contact MR AB at the address **Människans Resurser AB Bysistorget 4, 1 tr. 118 21 Stockholm** 

to exercise your rights. You are also always entitled to contact us at mail@mr-ab.se. See section 7 below for more information about these rights.

Occasionally, we may need to update or change the Policies. If so, we will inform you in an appropriate manner and ask you to take note of the changes made. The latest version of Policy is always available on our website.

We hope that this Policy will answer your questions about our collection, use, and the protection of your personal data. If you have further questions or concerns, please feel free to contact us by sending a letter to Människans Resurser AB Bysistorget 4, 1 tr. 118 21 Stockholm or by e-mail to <a href="mail@mr-ab.se">mail@mr-ab.se</a>.

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# 3. PERSONAL DATA AND PERSONAL DATA PROCEDURE

"Personal Data" means any kind of information that may be directly or indirectly attributed to a living physical person in life. This may involve data such as names, email addresses or telephone numbers, but information such as address may be covered if the information can be linked to a physical person.

"Personal Data Processing" means any measure or combination of personal data measures, whether or not the measure is automated. Examples of commonly used treatments are collection, registration, organization, structuring, storage and deletion.

- 4. OUR TREATMENT OF PERSONAL DATA
- 4.1 Information that may be processed by MR AB.
- 4.1.1 Contact person with potential customer.

Establishing business relationships with customers in order to develop MR AB's services, products and systems is an important part of MR AB's core business.

In order to contact you as a potential customer regarding MR AB's services and products and marketing activities, MR AB collects your personal information. These are collected either via internal networks or from third parties, such as public registers or social media, and are stored in MR AB systems with the aim of MR AB to establish a business relationship with you and that MR AB will be able to invite you to market activities.

The processing of these personal data is based on MR AB's legitimate interest in establishing and maintaining business relationships as well as being able to develop its services, products and systems.

MR AB has the routine that every employee who via telephone or digital channel has contacted you and where you during the conversation showed interest in creating or exploring a further relationship with MR AB, will follow up with an email containing a link to this Policy. In cases where MR AB initiated the first contact through an e-mail or printed material, a reference to Policy is always included in order for you as a registered person to receive the necessary information about the processing of your personal data.

Your personal data is stored in the MR AB register for marketing communications and information purposes.

MR AB will only make such marketing mailing to be relevant to your interest. For each mailing you will be given the opportunity to unsubscribe. In cases where MR AB has contacted you and you refuse to create or explore a further relationship, the personal data in MR AB's part of the business system will be marked with a note not to resume contact. We will also cease to send marketing mailing to you.

# **THINNING**

MR AB will process your personal information until they are no longer required to meet the above mentioned purpose or until you request that no longer be registered in MR AB register. The personal data will then be deleted without unnecessary delay. If a business relationship has not evolved within one year from MR AB's first contact, your personal information will be deleted. MR AB has furthermore set up thinning routines to regularly delete such contact information that no longer fulfills its purpose.

THE PERSONAL DATA MR AB MAY COLLECT AND PROCESS FOR THE ABOVE PURPOSES ARE:

- First and last name
- Contact information such as e-mail address, phone number and address
- Correspondence between you and MR AB
- Technical information about how you interact with MR AB

### 4.1.2 CONTACT PERSON OF EXISTING CUSTOMER

Maintaining business relations with customers in order to develop MR AB's services, products and systems is an important part of MR AB's core business.

In order to maintain contact with you as a customer regarding MR AB's services and products and marketing activities, MR AB processes your personal information. These are collected either via direct contact, or from internal networks, such as public registers or social media, and are stored in MR AB's registers with the aim that MR AB will be able to maintain a business relationship with you and that MR AB will be able to invite you to market activities.

The processing of these personal data is based on MR AB's legitimate interest in developing our business relationship and allowing MR AB to communicate with you as a contact person.

Your personal data is stored in MR AB's marketing mailing Register for communication and information purposes.

MR AB will only make such mailings to be relevant to your interest. For each mailing you will be given the opportunity to unsubscribe.

### **THINNING**

MR AB will not process your contact details longer than is necessary for the above mentioned purposes. Personal data that have become out of date, such as due to retirement or terminated business relationship, are deleted without unnecessary delay as soon as MR AB has received information about this. The data will also be deleted without unnecessary delay at your explicit request. MR AB has furthermore set up thinning routines to regularly delete such contact information that no longer fulfills its purpose.

THE PERSONAL DATA MR AB MAY COLLECT AND PROCESS FOR THE ABOVE PURPOSES ARE:

- First and last name
- Contact details such as e-mail address, telephone number, address
- Order history
- Correspondence between you and MR AB

# 4.1.3 CONTACT INFORMATION REGISTRATION VIA THE WEB PAGE

Establishing and maintaining business relationships with customers and other stakeholders in order to develop MR AB's services, products and systems is an important part of MR AB's core business. In order to contact you as an interest in MR AB's services and products as well as marketing activities, the company collects your

personal information. These personal data are collected from you when you make an interest report via MR AB's website or MR AB's activities. The data will be stored in the company's marketing tools with the aim of the company to establish a business relationship with you.

Your personal data is also stored in the company's system for market outlets for communication and information purposes.

MR AB will only make such mailings as the company considers relevant to your interest. For each mailing you will be given the opportunity to unsubscribe.

#### **THINNING**

MR AB will process your personal information until it is no longer necessary to meet the above mentioned purpose or until you request that no longer be registered with MR AB register. The personal data will then be deleted without unnecessary delay. If a business relationship has not been developed within three years of receipt of your interest report, MR AB will delete your personal information.

MR AB has furthermore set up thinning routines to regularly delete such contact information that no longer fulfills its purpose.

THE PERSONAL DATA COLLECTED AND PROCESSED FOR THE ABOVE PURPOSES ARE:

- First and last name
- Contact information such as e-mail address and phone number
- Correspondence between you and MR AB
- Technical information on how you have interacted with MR AB

The processing of these personal data is based on the consent you provide when submitting your interest report.

# 4.1.4 PERSONS WHO AGREED TO BE INCLUDED IN OUR REGISTERS

The descriptions below are applicable in relation to MR AB. We have the routine that every employee who contacts a potential candidate via telephone or digital channel and where the contact leads to a mutual wish for a continued dialogue, follows up with an email referring to an MR AB customer register. In the customer registry system, consent is obtained to this Policy and to be in order to contact or convey customer profile stored in MR AB's database. With this, the potential candidate is considered to be a customer candidate.

In order to contact or convey product offers to customer candidates as agreed to be stored in MR AB's customer database and in order to maintain a relationship with these candidates, MR AB deals with the candidates' personal data. The personal data has MR AB collected from you as a candidate, through the company's contact collection.

In addition to personal data mentioned above, the MR AB will not actively collect or process sensitive personal data (such as information about union membership, political opinions, sexual orientation or religious beliefs) or information that is irrelevant for the purchase of. It is therefore important that you as a candidate do not provide such sensitive personal data or information that is irrelevant to the services you are looking for. It is also important that you inform any references that their personal data have been submitted to MR AB.

#### **THINNING**

MR AB will save your personal information for future product offerings or activities. You can send an email at mail@mr-ab.se at any time to revoke your consent (read more under "Revocation of consent").

Data relevant to a single product sale or product support process, such as phone or other data collected, and references data are only saved for as long as they are necessary for the process in question and thereafter for up to two years after the end of the product purchase and / or product support. This is because MR AB will be able to exercise its right in case of a possible discrimination dispute. MR AB thins on a regular basis their customer database system for it to fulfill its purpose and be kept up to date.

### 4.1.5 PERSONS FOUND IN OUR REGISTER BEFORE 2018-05-25

The descriptions below are applicable in relation to MR AB.

In order to contact or convey product information to candidates or customers historically registered in MR AB's candidate and customer database, and in order to maintain the relationship with such candidates / customers, MR AB will process the candidates / customers personal data.

Personal data has MR AB collected from you as a candidate / customer during a previous collection process or for a general application. Personal data is processed in MR AB's candidate / customer database. MR AB's processing of your personal data is based on the company's legitimate interest in being able to maintain and develop the relationship with you as an existing candidate / customer and to continue to present relevant product offers.

The information in the section "Persons who agreed to be included in our registry" above, which categories of personal data we process, transfer of information to customer and galling times, etc., also apply to you as a candidate / customer who existed in our systems before 2018-05 -25, why we refer there for more information.

# 4.2.1 USERS OF MR AB'S PRODUCTS AND SERVICES

In order to be able to meet customer support services and to keep track of who has access to and use MR AB's products, MR AB has a need to process user data.

Your personal data is stored in MR AB's registry and on the company's platforms for market outlets for communication and information purposes. MR AB will only make such messages as they consider relevant to your interest. For each mail, there will be the possibility of unregistering.

The processing of the above information is based on the consent you give when you contact MR AB to purchase / get info about products or to participate in MR AB's activities for the first time after May 25, 2018.

Your personal information may be transferred to the support department that manages support and development of services, provided with marketing mail. This is done in order for MR AB to provide support services, other features and marketing promotion to you as a user.

#### **THINNING**

Your personal data will be processed by MR AB as long as the contractual relationship with the customer exists and then for a year for marketing purposes. However, MR AB's processing of personal data will terminate earlier if you revoke your consent or expressly request it.

THE PERSONAL DATA COMPANY TREATS FOR PURPOSES MENTIONED ABOVE ARE:

- First and last name
- E-mail address
- Product information the customer has purchased

# 4.2.2 SEMINARS AND EDUCATION

In order to provide seminars and courses, register the number of participants, print the required documentation and to be able to make marketing reports, MR AB has a need to process the participants' personal data.

The processing of your personal data is based on MR AB's legitimate interest in setting up attendance lists, etc. and otherwise administer seminars and educations that you have signed up for. It is also in the interests of customer that you participate in the programs you have shown interest in.

Your personal data recorded on a participant list may be transferred to external lecturers who attend the training and to hired printers. This is done for preparatory purposes, such as the printing of teaching materials, certificates and diplomas.

Your personal data will be processed by MR AB during the current education and then for one year for marketing purposes. However, MR AB's processing of personal data will terminate earlier if you explicitly request it.

#### THE PERSONAL DATA MR AB TREATS FOR THE PURPOSES MENTIONED ABOVE ARE:

- First and last name
- Contact details such as e-mail address, telephone number, address
- Billing Details
- Notes for training opportunities

This information is obtained either from you as a participant or from a contact person at the customer who is responsible for notifications and coordination with MR AB prior to each training session.

# 5. DIRECT MARKETING

You are entitled to object to the use of your personal data for direct marketing. Direct marketing refers to all types of outreach marketing measures, such as via email and text messages. You are free to oppose the use of your data for such purposes, and any mail from MR AB for marketing purposes includes the possibility of unsubscribing. If you choose to unsubscribe from further mailings, MR AB will make a listing in their system of discontinuing direct marketing to you.

# 6. THE PROTECTION OF YOUR PERSONAL DATA

MR AB has taken a number of security measures to ensure that the company's personal data processing is done safely and to protect the personal data processed against unauthorized access, unauthorized use and abuse. For example, is access to the systems in which personal data is stored limited to MR AB's employees and service providers who need to reach the data within the scope of their duties. These are also informed of the importance of maintaining the security of personal data and internal routines have been established, regulates the use of passwords and work done outside the office and abroad. MR AB continuously monitors company's systems for detecting vulnerabilities and protecting your personal data.

# 7. YOUR RIGHTS WHO IS REGISTERED

You as a registered person always have the right to claim your rights against MR AB which you have contacted by contacting the company at the address under section 1 or via mail@mr-ab.se or ekonomi@mr-ab.se or jan.mr@ mr-ab.se. The following pages provide a brief description of the rights you may claim.

# 7.1 THE RIGHT TO ACCESS

If you want a better understanding of what personal data we are dealing with just about you, you can request access to the information. The information will be provided in the form of a registry extract which specifies the personal data we process, the purposes for which data are processed, where the information has been obtained from, the third parties to whom the data has been transferred and how long the data will be stored. If

your request is made electronically, the information will be provided in an electronic format that is widely used, unless you request anything else.

# 7.2 THE RIGHT TO CORRECTION OF PERSONAL DATA

You have the right to promptly correct inaccurate information about you. You also have the right to supplement incomplete information, such as by providing a supplementary statement.

# 7.3 THE RIGHT TO DELETE PERSONAL DATA

You are entitled to request the deletion of your personal information that we are processing about you if:

- Personal data is no longer necessary for the purposes for which it were collected or otherwise processed.
- You revoke your consent for a treatment that is based on your consent and there is no other legal basis for the treatment.
- You oppose a treatment that relies on a balance of interests and your objection of objection weighs heavier than our legitimate interest
- Personal data is processed illegally.
- Personal data must be deleted as a result of a legal commitment that we have to fulfill.

In case there are legal obligations that prevent us from deleting certain personal data immediately, we may deny your request for deletion. These obligations include, for example, in accounting legislation. It is also possible that continued treatment is necessary for us to claim, defend or determine legal claims. Should it be that our legal obligations prevent us from deleting your information, we will instead mark them so that they are no longer actively used in our systems.

In addition to the above rights, you also have the right to request that the processing of your personal data be restricted and object to all processing of personal data that relies on a balance of interest. If so, we must demonstrate compelling justifying reasons that weigh heavier than your interests, rights and freedoms to continue the treatment. In cases where our processing of personal data is based on your consent, you also have the right to request the information that concerns you and that you provided, transferred to another personal data controller (so-called data portability). A condition for

Data portability, however, is that the transmission is technically possible and can be automated.

# 7.4 THE RIGHT OF LIMITATION OF TREATMENT

You are entitled to request that the processing of your personal data be restricted if any of the following options apply:

- 1. You deny the correctness of personal data for a time that allows the subsidiary to check if the information is correct;
- 2. The processing is illegal and you oppose that the data is deleted and instead request a restriction on it use;
- 3. MR AB no longer needs personal data for the purpose of the treatment but you need them to be able to determine, claim or defend legal claims;
- 4. You have objected to a treatment that is based on an interest weighing and MR AB checks whether the Company's legitimate reasons weigh heavier than your legitimate reasons.

If treatment has been restricted in accordance with this paragraph, such personal data as limitation of treatment may be treated, except for storage, solely for the purpose of determining, claiming or defending legal claims or for protecting third party rights or reasons that are important general interest of the EU or of an EU Member State.

# 7.5 THE RIGHT TO DATA PORTABILITY

In cases where the subsidiary's processing of personal data is based on your consent or performance of the agreement, you are entitled to request that the information that concerns you and that you provided to MR AB be transferred to another person responsible for data. A prerequisite for this is, however, that the transfer is technically possible and can be automated. Such personal data as limitation of treatment shall be for processing, except for storage, solely processed to establish, enforce or defend legal claims or to protect third party rights or reasons relating to an important public interest for the EU or for an EU Member State.

# 7.6. REVOCATION OF CONSENT

In cases where MR AB's processing of your personal data is based on your consent, you are always entitled to withdraw your consent at any time.

A withdrawal does not affect the legality of the treatment that has occurred based on your consent before withdrawal. If you revoke your consent, MR AB will no longer process the personal data based on your consent, unless the Company is legally bound to continue processing them. Should it be that MR AB's legal obligations prevent the company from erasing your data, the company will instead mark them so that they are no longer actively used in MR AB's system.

You can send an email to mail@mr-ab.se or to jan.mr@mr-ab.se at any time to revoke your consent. MR AB will respond promptly to your request.

## 7.7. SUBMISSION OF COMPLAINT

The Data Inspectorate is the authority that is responsible for monitoring the application of legislation among companies that process personal data. If you believe that we are processing your personal information incorrectly, you may, in addition to contacting us via mail@mr-ab.se or jan.mr@mr-ab.se, file a complaint with the Data Inspectorate.

We hope that this information has provided you with the answers to your questions.